

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

DR. JENNIFER LYNN GLASS, <i>et al.</i> ,	:	
<i>Plaintiffs,</i>	:	
	:	
v.	:	No. 1:16cv845-LY
	:	
KEN PAXTON, <i>et al.</i> ,	:	
<i>Defendants.</i>	:	
	:	

JOINT PROPOSAL ON PRELIMINARY INJUNCTION MATTERS

The plaintiffs and defendants jointly submit the following proposal for procedures for the preliminary injunction proceeding. These proposals reflect the results of the conference call with the Court on July 15, 2016.

1. The plaintiffs shall file their application for a preliminary injunction no later than July 22, 2016. As exhibits, the application may include declarations and other documents in support of the application. The application shall not exceed 3 pages, excluding exhibits, and the brief in support of the motion shall not exceed 30 pages. Page lengths in this and subsequent paragraphs in this joint proposal are determined under the last sentence of Local Rule CV-7(d)(3).

2. The defendants shall file their responses to the plaintiffs' application for preliminary injunction no later than August 1, 2016. As exhibits, the responses may include declarations and other documents in opposition to the application. If the defendants file a single response, the response shall not exceed 30 pages, excluding exhibits. If The University of Texas defendants and the Attorney General of Texas defendant file separate responses, the responses shall not exceed a total of 45 pages, excluding exhibits.

3. The plaintiffs shall file any reply to the defendants' responses no later than 5:00 p.m. on August 3, 2016. The reply shall not exceed 10 pages if the defendants file a single response

or 15 pages if The University of Texas defendants and the Attorney General of Texas defendant file separate responses.

4. The hearing on the application for preliminary injunction shall commence at 2:00 p.m. on August 4, 2016. The time allotted shall not exceed three hours. The application will be submitted on the pleadings, exhibits, and arguments of counsel.

5. The parties stipulate to the following facts:

a. Defendant Gregory L. Fenves, President of The University of Texas at Austin (“UT Austin”) adopted policies under Tex. Gov’t Code § 411.0231(d-1) (“initial UT Austin campus carry policies”) and forwarded them to the Chancellor of The University of Texas System (“UT System”) on February 17, 2016. Stipulated Joint Exhibit 1 is a true and accurate copy of the transmittal letter and initial UT Austin campus carry policies.

b. The UT System Board of Regents (“Board of Regents”) met in public session twice after transmittal of the initial UT Austin campus carry policies: on May 12 and July 13, 2016.

c. Item 3 on the published agenda for the Board of Regents’ May 12, 2016, meeting was “Review and possible action regarding institutional and U. T. System Administration campus carry rules, regulations, and provisions.” The Board of Regents took no action on this item at the meeting.

d. Item 2 on the published agenda for the Board of Regents’ July 13, 2016, meeting was “Review and possible action regarding institutional and U. T. System Administration campus carry rules, regulations, and provisions.” The Board of Regents took action on this item at the meeting. Its action was to amend the initial UT Austin campus carry policies by eliminating Policy Statement No. 3, which had stated that “A license holder who carries a semiautomatic handgun on campus must carry it without a chambered round of ammunition.”

e. The initial UT Austin campus carry policies, as amended by the Board of Regents, will take effect on August 1, 2016.

f. On July 14, 2016, UT Austin’s Executive Vice President and Provost, Dr. Maurie McInnis, e-mailed UT Austin’s general faculty about the Board of Regents’ action of July 13, 2016. Stipulated Joint Exhibit 2 is a true and accurate copy of Dr. McInnis’ e-mail.

g. Classes for the Fall 2016 semester at UT Austin begin on August 24, 2016.

6. Defendants simultaneously file a motion for extension of time to file their responsive pleadings to plaintiffs' complaint. Plaintiffs shall file their response to the motion for extension of time either by July 25, 2016, or 3 days after the motion's filing, whichever is later.

7. By agreeing to this joint proposal, the defendants do not consent to the Court's jurisdiction in this cause.

Respectfully submitted,

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